



*Consulting Engineers  
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September 12, 2005  
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: August 2005 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Participation in Scoping Phase Meeting (SOW Paragraph 16) – August 4, 2005;
  - Provision of a copy of the UAO to the contractors and subcontractors which have been retained to date to conduct work performed under the UAO (UAO Paragraph 4) - provided to Benchmark Environmental Services, Inc., Quality Assurance Associates, LLC, and Gulf Coast Analytical Laboratories, Inc. within 14 days of the UAO's effective dated or 14 days of their respective retention dates on the project, whichever is later;
  - Submittal of RI/FS Site Health and Safety Plan (SOW Paragraph 29) – August 18, 2005;
  - Progress report on access acquisition efforts and request for extension (UAO Paragraph 72) – August 25, 2005;
  - Submittal to EPA of the names, titles and qualifications of those currently retained to be used in carrying out the work, including copy of Contractor's Quality Management Plan (UAO Paragraph 42) - August 29, 2005; and
  - Submittal of Draft Screening Level Ecological Risk Assessment (SLERA) Report (SOW Paragraph 37(d)(v)) – August 29, 2005;

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2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Preparation of Draft RI/FS Work Plan (SOW Paragraph 17) – to be submitted to EPA by September 27, 2005;
  - Preparation of Draft RI/FS Sampling and Analysis Plan (SOW Paragraph 25) – to be submitted to EPA by September 27, 2005;
  - Submittal of Financial Assurance (UAO Paragraph 83) – to be submitted by October 26, 2006; and
  - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) (UAO Paragraph 72) – per August 25, 2005 extension request noted above, proposed to be obtained by October 28, 2005.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS will be described in the RI/FS work plan. Until that work plan has been prepared and approved by EPA, it is not possible to estimate a percentage completion for the project. During the previous month, no delays that may affect the future schedule for completion of the work were encountered or anticipated.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Scott Magelssen - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP